

The motion for leave to file under seal is granted.  
Plaintiffs shall file under seal an unredacted copy of  
the underlying document. The Clerk shall terminate  
the motion, ECF No. 189.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SO ORDERED.

6.4.25 /s/ Alvin K. Hellerstein

-----X  
ARIEL E. BELEN, as Temporary Co-Trustee of the Trust created  
by Harold Herman dated March 1, 1990 and as Temporary Trustee  
of the Trust created by Rosemarie Herman dated November 27,  
1991, and ROSEMARIE HERMAN, as Co-Trustee of the Trust  
created by Harold Herman dated March 1, 1990,

Plaintiffs,

Case No. 22-cv-6455  
(AKH)

-against-

JULIAN M. HERMAN, ROCLA, LLC, ROCLAB, LLC, THE  
VANGUARD GROUP, INC., OAKWORTH CAPITAL BANK,  
DENTONS SIROTE, PC and HOWARD NEISWENDER,

Defendants.  
-----X

**NOTICE OF MOTION  
FOR LEAVE TO FILE  
DOCUMENTS UNDER  
SEAL**

**PLEASE TAKE NOTICE** that upon the declaration in connection with motion to seal of  
Gayle S. Gerson, Esq., dated May 20, 2025, and upon all prior pleadings in this case, plaintiffs  
Hon. Ariel E. Belen (Ret.), as Temporary Co-Trustee of the Trust created by Harold Herman dated  
March 1, 1990 and as Temporary Trustee of the Trust created by Rosemarie Herman dated  
November 27, 1991, and Rosemarie Herman, as Co-Trustee of the Trust created by Harold Herman  
dated March 1, 1990 (collectively, the “Plaintiffs” or “Trustees”) will move before the Honorable  
Alvin K. Hellerstein, at the United States District Courthouse located at 500 Pearl Street, New  
York, New York 10601, at a date and time to be determined by the Court, for an order granting  
leave to file a document under seal, which is annexed to Plaintiffs’ Reply in Further Support of  
Motion to Compel Vanguard and Oakworth to Produce Documents Improperly Withheld Based  
on Assertion of Statutory Privilege. [ECF Doc. No. 181-182]

**PLEASE TAKE FURTHER NOTICE** that answering papers, if any, shall be served  
within the time provided for in Fed. R. Civ. P. 6 and Local Rule 6.1 of the Southern District of  
New York.

Dated: Garden City, New York  
May 20, 2025

JASPAN SCHESINGER NARENDRAN LLP  
*Attorneys for Plaintiffs*

By: /s/Gayle S. Gerson  
STEVEN S. SCHLESINGER  
GAYLE S. GERSON  
LAUREL R. KRETZING  
300 Garden City Plaza, 5<sup>th</sup> Floor  
Garden City, New York 11530  
(516) 746-8000